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Pro-per

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

LNV CORPORATION

**PLAINTIFF** 

v.

ROBYNNE A. FAULEY; U.S. BANK NATIONAL CORPORATION

**DEFENDANTS** 

Case No: 3:15-cv-01422-HZ

DEFENDANT FAULEY'S
ANSWER TO LNV'S COMPLAINT

# **DEFENDANT FAULEY'S ANSWER TO LNV'S COMPLAINT**

Defendant ROBYNNE A. FAULEY, for her Answer, says as follows:

### **PARTIES**

- 1. Defendant neither admits nor denies, leaving Plaintiff to its proofs
- 2. Defendant admits the allegations contained therein
- 3. Defendant neither admits nor denies, leaving Plaintiff to its proofs

#### JURISDICTION AND VENUE

4. Defendant neither admits nor denies, leaving Plaintiff to its proofs

5. Defendant admits the allegations contained therein

## FACTS AND BACKGROUND

- 6. Defendant admits the allegations contained therein
- 7. Defendant denies the allegations contained therein
- Defendant denies the allegations contained therein, and specifically denies Plaintiff's Exhibit
   A is a true copy of said Note
- 9. Defendant denies the allegations contained therein
- Defendant denies the allegations contained therein and specifically denies Plaintiff's Exhibit
   B is a true copy of said Trust Deed.
- 11. Defendant neither admits nor denies, leaving Plaintiff to its proofs
- 12. Defendant neither admits nor denies, leaving Plaintiff to its proofs
- 13. Defendant neither admits nor denies, leaving Plaintiff to its proofs
- 14. Defendant denies the allegations contained therein.
- 15. Defendant denies the allegations contained therein
- 16. Defendant denies the allegations contained therein.
- 17. Defendant denies all allegations contained therein.
- 18. Defendant denies the allegations contained therein.

- 19. Defendant denies the allegations contained therein.
- 20. Defendant neither admit nor denies, leaving plaintiff to its proofs.
- 21. Defendant neither admit nor denies, leaving plaintiff to its proofs.
- 22. Defendant denies all allegations contained therein
- 23. Defendant admits the allegations contained therein.
- 24. Defendant denies the allegations contained therein.
- 25. Defendant admits filing a prior complaint against plaintiff and others and admits it was dismissed however a Rule 60b Motion was filed to reinstate the cause, based upon newly discovered evidence, and it was denied.
- 26. Defendant denies all allegations contained therein.
- 27. Defendant neither admits nor denies the allegations contained therein, leaving plaintiff to its proofs.
- 28. Defendant denies the allegations contained therein, and more specifically denies that Plaintiff's Exhibit D is a true and correct copy.

## PLAINTIFF'S FIRST CAUSE OF ACTION

- 29. Defendant herein re-alleges and incorporates by reference as if fully set forth herein it's answers to paragraphs 1 through 28 above.
- 30. Defendant denies all allegations contained therein.

- 31. Defendant denies all allegations contained therein.
- 32. Defendant denies all allegations contained therein.
- 33. Defendant denies all allegations contained therein.
- 34. Defendant denies all allegations contained therein.
- 35. Defendant denies all allegations contained therein.
- 36. Defendant denies all allegations contained therein.
- 37. Defendant denies all allegations contained therein.
- 38. Defendant denies all allegations contained therein.
- 39. Defendant denies all allegations contained therein.
- 40. Defendant denies all allegations contained therein

WHEREFORE, Defendant ROBYNNE A. FAULEY, denies all allegations contained within Plaintiff's "Prayer For Relief", specifically denying sub-paragraphs "A through D" and respectfully prays that Plaintiff's Complaint be dismissed in its entirety and Defendant be awarded costs and Attorney Fees so wrongfully incurred herein.

Respectfully Submitted by:

Robynne A. Fauley, Pro-per

DATED: AUGUST 20, 700